

"Roland, John L. (ECY)" <JROL461@ECY.WA.GOV> 06/07/2006 10:25 AM To Monica Tonel/R10/USEPA/US@EPA

CC

bcc

Subject Surface Water Release Reporting - Teck Cominco Trail

History:

P This message has been replied to.

Monica - In response to the effort to improve notifications and to assist EPA with the terms of your contract with Teck I have the following items:

For your information, we have an MOU with BC Ministry of Environment for notification. So, this commitment from Teck offers a nice layer of redundancy on the "spills" side of things.

Spills, Excursions Release Reporting: **509-329-3400** is the phone to Ecology's Eastern Regional Office during regular working hours (M-F). Notifications and contact information will then be immediately forwarded to appropriate ERO staff on call. After hours and on weekends, holidays, etc. the number provides an option to report spills by directly connecting to our statewide Emergency Management center. Calls transferred to this number will serve as the appropriate after-hours notification since that system will then result in a chain reaction of notifications.

Comment/Request: Monica, this is a detail I think is missing in this arrangement. When our first responder staff think of releases in the Columbia they are thinking of major releases, like major sewer spills, obvious fish kills, globs of mercury, etc. What's seriously missing is reports from Cominco when a spill or discharge excursion will likely lead to temporary violations of the U.S. CWA water quality standards. This would not be a tough thing to do. They could easily build a spreadsheet. Based on current flow in the river, standard mixing assumptions, estimated (and soon there after measured) spill amounts they (Teck) could quickly assess whether violations may occur over the border. That step could be a part of their criteria for notification to us, as well as BC environment. That way we build a more appropriate record of the lower level impacts and could conduct prompt samplings if deemed necessary by any of the agencies in the U.S. I'm hoping this concept could be pushed for as part of their notification process. It's a no brainer if fish are dieing. It's more valuable if lower threshold releases are documented and quickly reported.

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